

To: Kaplan, Robert[kaplan.robert@epa.gov]
From: Dennis Vickers
Sent: Mon 10/3/2016 7:19:41 PM
Subject: Open Pit Mine in Menominee County Michigan

Robert Kaplan, Administrator, Region 5, Environmental Protection Agency
 Dear Mr. Kaplan:

I am strongly opposed to the 'Back 40' project proposed by Aquila Resources Inc. in Menominee County, Michigan. While I generally favor initiatives that bring jobs to the region, I believe this project should not be allowed to go forward for several reasons:

1. The Menominee cultural and archaeological sites on the property are much too valuable to sacrifice them to an open pit mine. Aquila Resources claims the burial mounds will be left intact and only the agricultural beds and village sites destroyed, but this area has never been thoroughly evaluated by competent archaeologists using modern methods. No one knows for certain what the cultural and archaeological losses would be. Furthermore, the burial mounds are sacred places. Even if the pit doesn't swallow them, their integrity would be greatly compromised by being left adjacent to an open pit mine. Aquila Resource's indifference to these values and dismissal of those who hold them is reprehensible. Indigenous people of the Western hemisphere have many times been victims to multi-national corporations and their quest for wealth for their managers and investors. Surely, the time has come to bring an end to this exploitation. Governments in general and the government of Michigan in particular should align with the people of the region they are in place to serve and their values, not the never-ending pursuit of profit with no regard for the costs to others.

2. The risks to the Menominee River and the local groundwater from acid mine drainage are unacceptable. Aquila Resources may make assurances to the contrary, but no sulfide mine has ever been constructed and operated without spreading sulfuric acid into the air and water. This is, quite simply, a known outcome of the process. To expect otherwise is Pollyannaish; to promise otherwise is disingenuous. Acidic pollutants in the Menominee River would likely bring an end to the sturgeon spawning there, a catastrophic outcome for that species.

Documents on Aquila Resources website spell out their projections of costs and returns for the project from their point of view, but these calculations do not consider the costs to people of the region. They do not consider financial implications for the pollution of the Menominee River, nor do they consider the immense costs to the Menominee people and their descendants. If these costs are considered, if you look beyond the narrow interests of Aquila's investors and managers, the project is a financial disaster for the region.

The Michigan Department of Environmental Quality is the front-line regulatory agency, but I fear they will give in to corporate and political pressures and make a mistake that can never be corrected. Please do what you can to see this doesn't happen.

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Dr. Dennis Vickers
Humanities Faculty, College of Menominee Nation

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